

**POLICE CRIMINAL COMPLAINT**

Docket Number	Date Filed <b>12/03/2015</b>	OTN/LiveScan Number	Complaint/Incident Number <b>20151203M5933</b>
Defendant Name	First <b>JOEIMARIE</b>	Middle <b>ASHLEY</b>	Last <b>HOFFMAN</b>

**AFFIDAVIT of PROBABLE CAUSE**

On December 3, 2015, this officer conducted an undercover operation investigating reports of illegal prostitution at hotels located along the Harrisburg Pike. The case was conducted using social media sites, backpage.com to contact females soliciting men for companionship.

A telephone call was made to a number listed under an ad for Kyley, #570-280-8889. The ad described a brunette, 5'4", 125 lbs, 34C with brown eyes who knows how to have fun. It went on to stated she would fulfill all of your playful desires and guarantees the best experience possible. The ad ended with saying she loves to please.

Upon calling the number a female answered she identified herself as Kyley. I asked her about meeting up and hanging out. She ask my age, ethnicity, location and if I was law enforcement and how long I wanted to spend with her. She was provided answers to her questions and informed me it would be \$150. for a half hour. I was ask how long it would be until I arrived in the area. She was told 40 minutes. I was instructed to call when I was close.

I advised other officers involved in the investigation that a meet had been set up. A second call was placed to Kyley and I was told to meet her at the Sunoco near exit 52, interstate 81. She instructed me to back in at the Sunoco so that she could see that I am alone. I was followed to the meet location by Chief Sherman and Officer Carver. They were also in street clothes, operating an unmarked vehicle.

I was called by Kyley who stated she could see me at the Sunoco and to continue to the rear of the Econo Lodge. I drove to the Econo Lodge across the street, along the Harrisburg Pike. Kyley called and informed to come to room 234, providing me with directions to her room.

Once inside her room Kyley again ask how long I wanted the session for. She was told one half hour. Kyley informed me the price would be \$150. She then instructed me to feel her breast. I did what she ask and she stated, okay your good. Kyley then began taking off her clothing, stripping down naked. I did the same with the exception of my under wear. Kyley instructed me to remove my pants too. I did so and layed on the bed.

Kyley retrieved a condom and lubricant from the nightstand. She placed the condom on my penis and sat down on the bed. She leaned forward to perform oral sex and was stopped. I identified myself as police and contacted Cumberland County Control to have the other officer come in the room.

The suspect was placed in custody and transported to Cumberland County Booking.

**I, CORPORAL KEITH SEIBERT (14)**, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

(Signature of Affiant)

Sworn to me and subscribed before me this 4<sup>th</sup> day of December, 2015  
12 4 15 Date Paul M. Fealy, Magisterial District Judge

My commission expires first Monday of January, 2018

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